

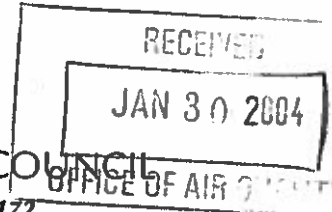
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STATE OF WASHINGTON

ENERGY FACILITY SITE EVALUATION COUNCIL

PO Box 43172 • Olympia, Washington 98504-3172



January 28, 2004

Mr. Andy McNeil
Duke Energy Grays Harbor, LLC
PO Box 26
Satsop, Washington 98583

Ms. Laura Schinnell
Energy Northwest
PO Box 968 MD: 1030
Richland, Washington 99352

Subject: Request to Extend and Amend the Notice of Construction/Prevention of Significant Deterioration Approval No. EFSEC/2001-01, Amendment 1

Dear Mr. McNeil and Ms. Schinnell:

The Council is in receipt of your January 19, 2004, request to extend and modify the Notice of Construction/Prevention of Significant Deterioration (NOC/PD) permit for the Satsop Combustion Turbine (CT) Project. EFSEC and Department of Ecology staff have completed an initial review of the extension request and offer the following comments.

The request package is currently incomplete. Before any further action can take place, we will need to have the following supporting information supplied:

1. All emissions and cost calculations supporting all of the proposed BACT determinations presented.
2. BACT costs analyses for NOx need to include an evaluation of the cost to control to both the 2.5 ppm and 2.0 ppm levels in the current approval along with an analysis why achieving these levels is not cost effective or outside the range of costs for other similar facilities. We agree that the 2.0 ppm level in the current approval was established for AQRV and visibility protection; however, recent facilities of this size in Washington are being permitted with emission limits of 2.0 ppm, 3-hr average as BACT.
3. For the CO BACT analysis, please supply the data supporting the statement that the uncontrolled CO from similar GE Frame 7 turbines is commonly at the 6 ppm level or less. The simple statement provided in the case is not sufficient to support relaxation of the BACT limitation. The data should indicate both the facility, the dates of the tests, and the state where the facility is located. Any information available on the QA/QC of the emissions information is also requested.
4. Similar information to what is requested for CO needs to be supplied to support your BACT determination for VOC from the combustion turbines.



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Please send a copy of the above information to both myself and Alan Newman at the Department of Ecology.

We look forward to meeting with you on February 26 to review the extension request and revised BACT information.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Mills". The signature is fluid and cursive, with the first name "Mike" and last name "Mills" clearly distinguishable.

Mike Mills
Compliance Manager

cc: Alan Newman, Ecology
Dan Meyer, EPA
Irina Makarow, EFSEC